

**IN THE UNITED STATES DISTRICT COURT FOR  
THE MIDDLE DISTRICT OF PENNSYLVANIA  
HARRISBURG DIVISION**

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JUDICIAL WATCH, INC.,

Plaintiff,

v.

COMMONWEALTH of  
PENNSYLVANIA, et al.,

Defendants.

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NO. 1:20-cv-00708  
(Judge Christopher C. Conner)

**MOTION FOR LEAVE TO FILE MEMORANDUM OF LAW OF THE  
COUNTY DEFENDANTS IN SUPPORT OF MOTION OF NON-PARTIES  
COMMON CAUSE PENNSYLVANIA AND LEAGUE OF WOMEN  
VOTERS OF PENNSYLVANIA FOR LEAVE TO INTERVENE**

Defendants Bucks County Commission, Bucks County Board of Elections, Bucks County Registration Commission, Thomas Freitag, in his official capacity as Elections Director for Bucks County, Chester County Commission, Chester County Board of Elections, Chester County Registration Commission, Sandra Burke, in her official capacity as Director of Elections in Chester County, Delaware County Council, Delaware County Board of Elections, Delaware County Registration Commission, and Laureen Hagan, in her official capacity as Chief Clerk, Elections Bureau for Delaware County (the “County Defendants”), hereby move this Court for an order granting them leave to file a memorandum of law in

support of non-parties Common Cause Pennsylvania and League of Women Voters of Pennsylvania's Motion to Intervene beyond the deadline for doing so. The County Defendants' proposed Memorandum of Law in Support of the Motion to Intervene is attached as Exhibit A. The grounds for this Motion are set forth in the accompanying Memorandum of Law, which is incorporated by reference.

WHEREFORE, the County Defendants respectfully request that the Court grant this Motion and direct the Clerk of Court to file on the docket the proposed Memorandum of Law attached as Exhibit A.

Respectfully,

Date: June 9, 2020

HANGLEY ARONCHICK SEGAL  
PUDLIN & SCHILLER

By: /s/ Mark A. Aronchick  
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\*Special Admission to the Middle  
District of Pennsylvania pending.